

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Paul Jones, Jr.) Case Number: 17-17369
Jennifer Jones) Chapter 13 Proceedings
Debtor(s).) Judge Jessica E. Price Smith

TRUSTEE’S OBJECTION TO THIRD MOTION TO MODIFY PLAN

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee (“Trustee”) herein, by and through counsel, and hereby objects to the Third Motion to Modify Plan filed with this Court on July 28, 2021 (hereinafter “Debtors’ Motion”). In support of her objection, the Trustee makes the following representations to the Court:

1. The Debtors’ Motion is not feasible because it will complete in excess of 84 months.
2. The proposed plan associated with the Debtors’ Motion does not provide for Velocity LLC.
3. The Trustee reserves the right to amend and/or supplement her objection should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtors’ Motion for the reasons cited.

Respectfully submitted,

/s/ Holly Davala

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CERTIFICATE OF SERVICE

I certify that on August 5, 2021, a true and correct copy of the Trustee's Objection to Third Motion to Modify Plan was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William Balena, Attorney, on behalf of Debtor(s) at docket@ohbksource.com

/s/ Holly Davala

HOLLY DAVALA #0070447

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